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Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: Support for Credit Union National Association's Petition for Declaratory Ruling  
under the Telephone Consumer Protection Act of 1991  
CG Docket No. 02-278

Dear Ms. Dortch:

My name is Angie Owens, and I am the President and CEO of American Airlines Federal Credit Union (American Airlines Credit Union or Credit Union). I appreciate the opportunity to write this comment letter in support of the Credit Union National Association's (CUNA) Petition for Declaratory Ruling under the Telephone Consumer Protection Act of 1991 (TCPA).

American Airlines Credit Union is a federally chartered credit union headquartered in Fort Worth, Texas. We have approximately \$6.8 billion in assets and serve more than 280,000 members located throughout the United States. We have been serving our members for more than 81 years.

Credit unions are not-for-profit financial cooperatives solely owned by its members. Unlike other for-profit companies whose goal is to increase shareholder value, we exist to serve our membership, and we have established business relationships with our member-owners.

Because we are a credit union, our members expect us to contact them about their accounts as a service to them. Members expect that their credit union will continually provide account updates in a timely and efficient manner, including via text message alerts. However, because of the burdens associated with the TCPA and its implementing regulation and rules, our communications to our members have been adversely affected.

Currently, if we need to contact our members using a landline phone, there is no requirement that we obtain a member's prior express consent to make these types of informational calls. However, under the TCPA if our members only have a cellphone and we contact them using an automatic dialing system, we must first obtain her consent or we could be subject to fines of up to \$1,500 per call or class action litigation.

Additionally, because of the TCPA's hyper-technical requirements, we have been hesitant to contact our members on their cellphones. We believe that this is an absolute disservice to our members. Clearly, the TCPA was not meant to create such confusion and interfere with credit unions' existing business relationships with its members.

With the overwhelming prevalent use of cellphones today and many members no longer using a landline phone, the decision to continue to treat calls to a cellphone differently than those to a landline when there is an existing business relationship is no longer defensible. We need to be able to provide timely information to our members without the fear that the TCPA will be used as a "gotcha" against the Credit Union.

Furthermore, granting CUNA's petition would align well with the Consumer Financial Protection Bureau's recent guidance urging banks and credit unions to text their consumers regarding financial information.

American Airlines Credit Union whole-heartedly agrees and supports CUNA's petition to equalize the treatment of landline and cellphones for informational messages from credit unions where there is an existing business relationship and not for telemarketing purposes. We also support CUNA's alternative position that informational calls or texts made by a credit union to a member's cellphone that are in fact free to the member be exempt. We believe that these exemptions allow credit unions to continue to service its members and at the same time protect its members' privacy.

Thank you for taking the time to review our comments. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Angie Owens", with a long horizontal flourish extending to the right.

Angie Owens  
President & CEO  
American Airlines Federal Credit Union

cc: CUNA